



CANADIAN ENVIRONMENTAL LAW ASSOCIATION
L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

February 14, 2007

Hon. John Baird
Minister of Environment
Les Terrasses de la Chaudière
10 Wellington St., 28th Floor
Gatineau, Quebec
K1A 0H3

RE: Notice of Objection regarding Polybrominated Diphenyl Ethers Regulations
Proposed Regulations in Canada Gazette, Part 1, Vol. 140, No. 50 – December 16, 2006

Dear Minister,

The Canadian Environmental Law Association (CELA) has closely monitored and provided detailed comments in response to the Canadian government's ongoing decision-making process concerning the environmental and health risks and associated regulation of polybrominated diphenyl ethers.

We have noted repeatedly that there is an urgent need for these dangerous chemicals to be comprehensively banned on the basis of strong evidence of risks to the environment and human health, particularly to the fetus and young child. Canadian regulatory action proposed last summer and again in December within the "Chemicals Management Plan" is inadequate. By not comprehensively banning all PBDEs, notably the deca-BDEs, your government is regulating the status quo, essentially avoiding the most serious aspects of this problem and giving the Canadian public a mistaken impression of action.

Therefore, pursuant to sections 332(2) and 333 of the *Canadian Environmental Protection Act* we make this notice of objection concerning the above-noted regulations and request that a board of review be established under section 333. Our reasons for this notice of objection are contained in the Notice of Objection prepared by Sierra Legal Defence Fund which you will be receiving directly from them today.

Yours very truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION

Kathleen Cooper
Senior Researcher